

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

LISA HORN-BRICHETTO,)
Plaintiff,)
v.) No. 3:17-cv-163-JRG-DCP
TIFFANY SMITH,)
RUSSELL JOHNSON, and)
BECKY RUPPE,)
Defendants.)

NON-PARTY WITNESSES'
MOTION FOR PROTECTIVE ORDER AND TO QUASH SUBPOENAS

Plaintiff, Lisa Horn-Brichetto, has issued and served four subpoenas to three non-party witnesses who are employed as parole officers with the Tennessee Department of Correction: Joe Guglielmucci, a parole officer supervisor; Chad Reep, a parole officer; and James Shipley, a parole officer. One subpoena commands Officer Reep to produce materials or permit inspection. The remaining three subpoenas command Officers Guglielmucci, Reep, and Shipley to appear and give deposition testimony. Because these officers are employees of the State of Tennessee, undersigned counsel from the Office of the Tennessee Attorney General enters a limited appearance in this matter on behalf of Officer Guglielmucci, Officer Reep, and Officer Shipley as non-party witnesses.

Pursuant to Fed. R. Civ. P. 26 and 45, the non-party parole officers move for a protective order forbidding the discovery requested and to quash all four subpoenas as irrelevant to Plaintiff's claims or defenses in this matter and because compliance would cause undue burden. The affidavits of Officer Guglielmucci, Officer Reep, Officer Shipley, and a Memorandum of Law are being filed concurrently in support of this motion.

Respectfully submitted,

HERBERT H. SLATERY III
ATTORNEY GENERAL AND REPORTER

By: /s/ Mary Elizabeth McCullohs
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CERTIFICATE OF SERVICE

I hereby certify that, on August 27, 2018, a true and correct copy of the foregoing *Non-Party Witnesses' Motion for Protective Order and to Quash Subpoenas* was filed electronically with the Clerk of Court using the electronic filing system which will send electronic notification of such filing to all parties that have appeared in this action, and was served, via U.S. Mail, postage prepaid, to the following:

Lisa Horn-Brichetto
4815 Kingston Pike
Knoxville, TN 37919

Pro se

/s/ Mary Elizabeth McCullohs
Mary Elizabeth McCullohs